

## Yeh, Alice

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**From:** Olsen, Marian  
**Sent:** Thursday, June 19, 2014 8:41 AM  
**To:** Yeh, Alice  
**Subject:** FOIA Response - NJDEP and EPA  
**Attachments:** Buchanan et al.pdf; Urban et al.pdf

**Follow Up Flag:** save  
**Flag Status:** Completed

{In Archive} Fwd: Letters attached  
Linda Cullen to: Marian Olsen 03/10/2010 11:48 AM

Marian,  
My mistake, these are in press. It's pretty clear the direction they're headed and we had better be prepared.  
Linda

>>> Mary Kearns-Kaplan 2/24/2010 2:08 PM >>>  
Hi all. The two letters are attached. Best, M

>>> Mary Kearns-Kaplan 2/24/2010 1:40 PM >>>  
Hi all. Your SOTTE letter has been posted as in-press along with Urban, et al's reply to your comment. I will obtain both for you ASAP.

Urban et al's reply to your comment

Science of The Total Environment. Article in Press, Corrected Proof - Note to users.  
doi:10.1016/j.scitotenv.2010.01.046

Response to Buchanan et al.'s comment on Urban et al. "Assessment of human health risks posed by consumption of fish from the Lower Passaic River (LPR), New Jersey" (2009, doi:10.1016/j.scitotenv.2009.03.004)

Jonathan D. Urban a, J. Andrew Tachovsky a, Laurie C. Haws a, Daniele Wikoff Staskal a and Mark A. Harris b  
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**Abstract:** Buchanan et al. assert that our recent fish ingestion risk assessment for a section of the Lower Passaic River (LPR) (Urban et al., 2009a) utilizes inappropriate ingestion rates and is inconsistent with state and USEPA guidelines and risk assessment procedures, and therefore underestimates the human health risks associated with angler exposure along this stretch of the river. However, they fail to support these assertions with evidence; indeed, in a recent response to similar allegations, we demonstrated that the utilized ingestion rates are, in fact, the most appropriate for this parameter (Urban et al., 2009b). Our reliance on data from a comprehensive, independently validated, peer-reviewed, and site-specific creel angler survey (CAS) in order to define fish and crab ingestion rates for this region of the LPR is fully compliant with USPEA guidelines. In fact, the crab ingestion survey and risk assessment cited by Buchanan et al. as evidence of crabbing activity and crab ingestion for this region was less comprehensive than the CAS in question, was not overseen by an independent panel, has yet to be peer-reviewed, and does not provide any activity or consumption data for this section of the LPR. Contrary to the implications of Buchanan et al., our effort provides a transparent, comprehensive, and scientifically legitimate human health risk assessment of fish ingestion for the lowest 6 miles of the LPR. Thus we adamantly disagree with the characterization and assertions put forth by Buchanan et al., and stand by the conclusions presented in Urban et al. (2009a) and defended in Urban et al. (2009b).

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Your letter

Science of The Total Environment. Article in Press, Corrected Proof - Note to users.  
doi:10.1016/j.scitotenv.2010.01.045

Letter to the Editor: Comment on Urban et al. "Assessment of Human Health Risks Posed by Consumption of Fish from the Lower Passaic River (LPR), New Jersey" (2009, doi:10.1016/j.scitotenv.2009.03.004)

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Abstract: Urban et al. (2009) presented a human health risk assessment for the Lower Passaic River that very narrowly defines fish consumption, ignores crab consumption, and is not consistent with current NJ or EPA risk assessment procedures and guidance. The restrictively defined consumption then leads to inappropriate conclusions on the risk of eating fish from this highly contaminated estuarine river. The paper underestimates angler exposure to contaminated fish, does not evaluate exposure to contaminated crab, and underestimates the cancer risks and non-cancer health hazards associated with these exposure pathways. The New Jersey Department of Environmental Protection along with the NJ Department of Health and Senior Services issues fish and crab consumption advisories for all state waters; these advisories should be followed for the Passaic River and surrounding waters: <http://www.state.nj.us/dep/dsr/FishSmartEatSmartNJ.org>.